

Robert A. Sacks (SBN 150146)
(sacksr@sullcrom.com)
Adam S. Paris (SBN 190693)
(parisa@sullcrom.com)
Diane L. McGimsey (SBN 234953)
(mcgimseyd@sullcrom.com)
SULLIVAN & CROMWELL LLP
1888 Century Park East
Los Angeles, California 90067
Telephone: (310) 712-6600
Facsimile: (310) 712-8800

Attorneys for Plaintiff SVB Financial Group

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SVB FINANCIAL GROUP,

Plaintiff,

v.

FEDERAL DEPOSIT INSURANCE
CORPORATION, as Receiver for
Silicon Valley Bank and Silicon Valley
Bridge Bank, N.A.,

Defendant.

Case No.: 5:24-cv-01321

**PLAINTIFF SVB FINANCIAL GROUP'S
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
SEALED**

Pursuant to Civil Local Rules 7-11, 79-5(e), and 79-5(f), Plaintiff SVB Financial Group (“SVBFG”) submits this administrative motion to file under seal its unredacted Complaint against the Federal Deposit Insurance Corporation, as Receiver for Silicon Valley Bank (“FDIC-R1”) and Silicon Valley Bridge Bank, N.A. (“FDIC-R2”). The Complaint contains information derived from materials designated “Highly Confidential” by non-party the Federal Deposit Insurance Corporation, in its corporate capacity (“FDIC-C”), pursuant to the protective order (“Protective Order”) entered in SVBFG’s Chapter 11 proceeding. (*See In re SVB Fin. Grp.*, No. 23-10367-MG (Bankr. S.D.N.Y.), ECF No. 428.) Under the Protective Order, Plaintiff shall file documents and information derived from materials designated “Highly Confidential” under conditional seal. (*See id.* at ¶ 20.) An unredacted version of the Complaint will be concurrently provided to the Court and served on Defendant. Based on the foregoing, Plaintiff moves to file the following under seal:

Document	Designating Party	Reason for Sealing
Unredacted Complaint	FDIC-C	References to materials designated “Highly Confidential” by FDIC-C

Dated: March 5, 2024

Respectfully submitted,

/s/ Robert A. Sacks

Robert A. Sacks

Adam S. Paris

Diane L. McGimsey

SULLIVAN & CROMWELL LLP

1888 Century Park East

Los Angeles, California 90067

Telephone: (310) 712-6600

Facsimile: (310) 712-8800

Sverker K. Hogberg

SULLIVAN & CROMWELL LLP

550 Hamilton Avenue

Palo Alto, California 94301

Telephone: (650) 461-5600

Facsimile: (650) 461-5700

Attorneys for Plaintiff SVB Financial Group

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on March 5, 2024, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system, and I hereby certify that on March 5, 2024, I caused the mailing of the foregoing via the United States Postal Service to the Designating Party FDIC-C.

/s/ Robert A. Sacks

Robert A. Sacks

(sacksr@sullcrom.com)

SULLIVAN & CROMWELL LLP

1888 Century Park East

Los Angeles, California 90067

Telephone: (310) 712-6600

Facsimile: (310) 712-8800